

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket Nos. 360, 361, 605, 606, 624, 625,
635 & 637**

**NOTICE OF FILING OF BLACKLINE OF (A) MODIFIED FIRST AMENDED JOINT
CHAPTER 11 PLAN OF LORDSTOWN MOTORS CORP. AND ITS AFFILIATED
DEBTORS; AND (B) DISCLOSURE STATEMENT PURSUANT TO 11 U.S.C. § 1125
WITH RESPECT TO MODIFIED FIRST AMENDED JOINT CHAPTER 11 PLAN OF
LORDSTOWN MOTORS CORP. AND ITS AFFILIATED DEBTORS**

PLEASE TAKE NOTICE that, on September 1, 2023, the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the *Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 360] (the “**Plan**”) with the Court.

PLEASE TAKE FURTHER NOTICE that, on September 1, 2023, the Debtors filed the *Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 361] (the “**Disclosure Statement**”) with the Court.

PLEASE TAKE FURTHER NOTICE that, on October 24, 2023, the Debtors filed the *First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 605] (the “**First Amended Plan**”)

PLEASE TAKE FURTHER NOTICE that, on October 24, 2023, the Debtors filed the *First Amended Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Joint Chapter*

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [Docket No. 606] (the “**First Amended Disclosure Statement**”) with the Court.

PLEASE TAKE FURTHER NOTICE that, on October 29, 2023, the Debtors have filed the *Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 624] (the “**Modified First Amended Plan**”).

PLEASE TAKE FURTHER NOTICE, that on October 29, 2023, the Debtors have filed the *Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 625] (the “**Modified First Amended Disclosure Statement**”).

PLEASE TAKE FURTHER NOTICE that, contemporaneously herewith, the Debtors have filed the further *Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 635] (the “**Further Modified First Amended Plan**”).

PLEASE TAKE FURTHER NOTICE, that contemporaneously herewith, the Debtors have filed the *Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 637] (the “**Further Modified First Amended Disclosure Statement**”).

PLEASE TAKE FURTHER NOTICE that for the convenience of the Court and all parties in interest, a blackline of the Further Modified First Amended Plan against the First Amended Plan is attached hereto as **Exhibit 1**, and a blackline of the Further Modified First Amended Disclosure Statement against the First Amended Disclosure Statement is attached hereto as **Exhibit 2**.

PLEASE TAKE FURTHER NOTICE that for the convenience of the Court and all parties in interest, change pages only of the blackline of the Further Modified First Amended Plan

against the Modified First Amended Plan is attached hereto as **Exhibit 3**, and changes pages only of the blackline of the Further Modified First Amended Disclosure Statement against the Modified First Amended Disclosure Statement is attached hereto as **Exhibit 4**.

Dated: October 30, 2023
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u> WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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